IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	: Bankruptcy No. 20-20425-GLT
VideoMining Corporation,	: Chapter 11
Debtor.	: :
VideoMining Corporation	: Document No
Movant,	: Related Document No.: 42
v.	: :
Enterprise Bank, White Oak Business	: :

Funding, Green Note Capital Partners, Inc.,

Respondents.

Ventures, LLC, Broadway Advance

MOTION TO WITHDRAW OBJECTION TO DEBTOR'S USE OF CASH COLLATERAL

Hearing Date:

Hearing Time:

March 12, 2020

3:30 P.M.

AND NOW comes Itria Ventures, LLC, ("Itria") and files the following Motion to Withdraw its objection to Debtor's use of cash collateral as follows:

- 1. On February 5, 2020, Debtor filed an emergency Motion to Use Cash Collateral, at Document No. 13.
- 2. On that same date, Debtor filed an emergency Motion to Release Receivables and Prohibit Interference with Debtor's Customers at Document No. 16.
- 3. On February 10, 2020, Itria filed an Objection to Debtor's Use of Cash Collateral, raising, as part of the Objection, the use of the Hershey's receivable by the Debtor.
- 4. At a hearing held on February 10, 2020, the Court entered an interim Order authorizing Debtor to use a portion of the cash collateral and further ordering that the Parties resolve the issue regarding the Hershey's receivable.

- 5. On February 21, 2020, at Document No. 59, Debtor filed a Status Report regarding the interest in the Hershey's receivable, advising the Court that the issue had not been resolved.
- 6. In the interim, Itria has carefully reviewed the matter and believes it is in all Parties' best interest that Itria withdraws its objection to Debtor's use of cash collateral filed at Document No. 42, and withdraws any other objection to the use of the Hershey's receivable.

WHEREFORE, Itria Ventures, LLC requests this Court grant its Motion to Withdraw its Objection and issue an appropriate Order.

Respectfully submitted,

FELDSTEIN GRINBERG LANG & MCKEE

By /s/ Jeffrey R. Lalama, Esquire

Jeffrey R. Lalama, Esquire PA ID No. 52709

E-mail: jlalama@fglmlaw.com

428 Boulevard of the Allies, Suite 600

Pittsburgh, PA 15219

Telephone: 412-263-6074

Facsimile: 412.263.6101

SEIDMAN & PINCUS, LLC

By /s/ Owen Lipnick, Esquire

Owen Lipnick, Esquire E-mail: olseidmanllc.com

777 Terrace Avenue, Suite 508

Hasbrouck Heights, NJ 07604

Telephone: 201-473-0047 NJ Bar ID No. 043041994